

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SUPERB MOTORS INC., TEAM AUTO SALES LLC,
ROBERT ANTHONY URRUTIA, 189 SUNRISE
HWY AUTO LLC, NORTSHORE MOTOR
LEASING, LLC, BRIAN CHABRIER, individually and
derivatively as a member of NORTSHORE MOTOR
LEASING, LLC, JOSHUA AARONSON, individually
and derivatively as a member of 189 SUNRISE HWY
AUTO, LLC, JORY BARON, 1581 HYLAN BLVD
AUTO LLC, 1580 HYLAN BLVD AUTO LLC, 1591
HYLAN BLVD AUTO LLC, 1632 HYLAN BLVD
AUTO LLC, 1239 HYLAN BLVD AUTO LLC, 2519
HYLAN BLVD AUTO LLC, 76 FISK STREET
REALTY LLC, 446 ROUTE 23 AUTO LLC and
ISLAND AUTO MANAGEMENT, LLC,

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY
THOMASSON, DWIGHT BLANKENSHIP, MARC
MERCKLING, MICHAEL LAURIE, THOMAS
JONES, CPA, CAR BUYERS NYC INC., GOLD
COAST CARS OF SYOSSET LLC, GOLD COAST
CARS OF SUNRISE LLC, GOLD COAST MOTORS
AUTOMOTIVE GROUP LLC, GOLD COAST
MOTORS OF LIC LLC, GOLD COAST MOTORS OF
ROSLYN LLC, GOLD COAST MOTORS OF
SMITHTOWN LLC, UEA PREMIER MOTORS
CORP., DLA CAPITAL PARTNERS INC., JONES,
LITTLE & CO., CPA'S LLP, FLUSHING BANK,
LIBERTAS FUNDING LLC, and J.P. MORGAN
CHASE BANK, N.A.,

Defendants.

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Plaintiffs Superb Motors, Inc., Team Auto Sales LLC, and Robert Anthony Urrutia
("Superb Plaintiffs") intend to introduce the following exhibits at the evidentiary hearing on
Plaintiffs' Motion to Modify the Preliminary Injunction (the "Hearing"), scheduled for

Case No.: 2:23-cv-6188 (JMW)

**PLAINTIFFS' SUPERB MOTORS
INC, TEAM AUTO SALES LLC,
AND ROBERT ANTHONY
URRUTIA'S EXHIBIT LIST FOR
THE FEBRUARY 20, 2024
EVIDENTIARY HEARING**

February 20, 2024 pursuant to the Court's Memorandum Order dated January 18, 2024 (ECF No. 134):

1. List of 120 Team Auto Sales LLC and/or Superb Motors, Inc.-owned vehicles, as set forth in ECF No. 11-18, at pp. 4-7.
2. List of 89 Team Auto Sales LLC and/or Superb Motors, Inc.-owned vehicles.
3. List of 43 Team Auto Sales LLC and/or Superb Motors, Inc.-owned vehicles, as set forth in ECF No. 56-2.
4. Proof of ownership for vehicles bearing stock nos. SU0994A; SU1338; SU1304; SU1274A; SU1275; SU1239; SU1216; SU1104A; SU1123; SU1128; SU0895B; SU0890A; SU1002A; SU848A; SU0619A; SU1312; SU1307; SU1276; SU0981A; SU1104A; SU0874B; SU0936; SU1334; SU1313; SU1297; SU1273; SU1221; SU1210; SU1142; SU1130; SU1131; SU1120RF; SU1127; SU1154; SU1082; SU1037; SU941A; SU0960A; SU0930; SU0942; SU0915BB; SU0933; and SU1305.
5. CarFax reports for vehicles bearing stock nos. SU0994A; SU1338; SU1304; SU1274A; SU1275; SU1239; SU1216; SU1104A; SU1123; SU1128; SU0895B; SU0890A; SU1002A; SU848A; SU0619A; SU1312; SU1307; SU1276; SU0981A; SU1104A; SU0874B; SU0936; SU1334; SU1313; SU1297; SU1273; SU1221; SU1210; SU1142; SU1130; SU1131; SU1120RF; SU1127; SU1154; SU1082; SU1037; SU941A; SU0960A; SU0930; SU0942; SU0915BB; SU0933; and SU1305.
6. Cash receipts for the relevant period.
7. Anthony Deo Payroll Information form.
8. ECF No. 112-1 (operative list of remaining forty-three (43) vehicles).
9. ECF No. 112-2 (CarFax Reports for Missing Vehicles).
10. ECF No. 112-3 (May 2023 Correspondence with Deo regarding Missing Vehicles).

11. ECF No. 112-4 (June 2023 Correspondence with Deo regarding Missing Vehicles).
12. ECF No. 112-5 (Deal Recap for Another Missing Vehicle).
13. ECF No. 112-6 (Proof of Ownership for Defendant Michael Laurie's Vehicle).
14. ECF No. 112-8 (Twelve (12) Vehicles Owned by Team Auto Sales LLC).
15. Nesna – Authorization Agreement for Corporation Payments (Credits).
16. National Funding – Notice of Denial for Incomplete Application.
17. Deo DMV Application.
18. Email Correspondence with Deo.
19. ECF No. 38-2 (Text Messages Exchanged Between Urrutia and Deo).
20. Efaz Deo GCM Newsletter Signature Page.
21. Flushing Bank Certification of Beneficial Owner(s).
22. Flushing Bank Deposits.
23. Manheim Vehicles List by Superb Motors Inc.
24. Marc Merckling GCM Newsletter Signature Page.
25. Mercedes Check - Michael Laurie.
26. Merckling Audit Logs.
27. Merckling Contact Information.
28. Michale Laurie GCM Newsletter Signature Page.
29. Superb Motors Shareholder Agreement.
30. Superb Motors Signature Cards.
31. Summary spreadsheets of dealership data.
32. Summary records of dealership data.
33. Declarations of all Defendants.
34. Email correspondence with NextGear regarding floorplan audits.

- 35. Correspondence with NMAC regarding floorplan audits.
- 36. Correspondence with NMAC regarding floorplan line.
- 37. General Ledger and related accounting reports.
- 38. Defendants' separate spreadsheet of vehicle locations

Dated: Lake Success, New York
February 15, 2024

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.
Jamie S. Felsen, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 303-1395 (direct dial)
(516) 328-0082 (facsimile)
jamiefelsen@mllaborlaw.com

Dated: Jamaica, New York
February 15, 2024

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.
Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)
(718) 489-4155 (facsimile)
emanuel@sagelegal.nyc

*Attorneys for Plaintiffs
Superb Motors Inc.,
Team Auto Sales LLC, and
Robert Anthony Urrutia*

VIA ECF
All counsel of record